

ALAMEDA COUNTY
CONGESTION MANAGEMENT AGENCY

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November 3, 2009
Agenda Item 3.2.2

Memorandum

Date: October 26, 2009
To: ACTAC
From: Saravana Suthanthira, Senior Transportation Planner
Subject: Final 2009 Congestion Management Program

Action Requested

ACTAC is requested to recommend that the Board approve the final 2009 Congestion Management Program (CMP). The final CMP will include the 2010 State Transportation Improvement Program (STIP) draft final program of projects considered under item 3.1 of the agenda along with modifications to Chapter 6-Land Use Analysis Program to address comments from the East Bay Bicycle Coalition at the July Board meeting. The Board approved draft CMP was mailed to MTC and all public libraries in Alameda County. It was also posted on the CMA's website and a notice of availability was sent to the CMA's mailing list. The public review period ended on September 11, 2009.

Next Steps

Upon approval by the CMA Board, the final CMP will be sent to MTC. It will be printed and distributed to the local jurisdictions and the public libraries. The CMP will also be posted on the CMA's website.

Discussion

The CMA Board approved the release of the draft 2009 CMP for public review on July 23, 2009 with the exception of Table 16- 2010 STIP Projects in Chapter 7-Capital Improvement Program, because 2010 STIP allocation was not available then due to state budget issues. The draft CMP was then circulated for comment. The public review period ended on September 11, 2009.

The draft final 2010 STIP Projects are considered under item 3.1 of the agenda. Upon approval by the CMA Board on December 3, 2009, the 2010 STIP Projects will be included in Table 16-2010 STIP Projects into Chapter 7- Capital Improvement Program.

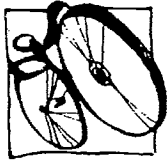
In response to comments received from the East Bay Bicycle Coalition at the July Board meeting (Attachment-1) and a follow-up meeting with them, Chapter 6-Land Use Analysis Program was modified to encourage local jurisdictions to consider a comprehensive TOD Program, including environmentally clearing all access improvements necessary to support TOD development, in their environmental documentation. Modified sections of the chapter can be found in

Attachment-2. Additionally, a letter (Attachment-3) was sent to the California Resources Agency commenting on the Draft CEQA Guideline Amendments and addressing, among other things, pedestrian and bicycle safety and circulation.

The following changes were made to clarify Chapter 8-Conformance, Monitoring and Deficiency Plans regarding the language on noticing requirements:

Local governments are required to adopt deficiency plans at a “noticed” public hearing – one for which ~~legal notices have been advertised~~ *notices have been posted as required by the Brown Act and any applicable local codes or policies.*

No other substantive comments were received.



EAST BAY BICYCLE COALITION
 P.O. BOX 1736 OAKLAND CALIFORNIA 94604
 FRUITVALE VILLAGE 3301 E12TH ST SUITE 143

July 22, 2009

Board and CMA Staff
 Alameda County Congestion Management Agency
 1333 Broadway, Suite 200
 Oakland CA 94612

Re: CEQA support

Dear Board Members and CMA Staff:

The East Bay Bicycle Coalition seeks your support to improve CEQA Transportation Guidelines (Appendix G of CEQA) and related rules, regulations and policies to make Alameda County a more walkable and more bikeable community. Currently, there are conflicts between the goal of the CMA Board to prioritize funding for transit-oriented development in the Alameda Countywide Transportation Plan and the Board's goal to implement high priority projects in the Alameda Countywide Bicycle Plan. EBBC supports both goals, but a problem has recently arisen due to new ABAG assumptions for increased infill development and the impacts such new development has in the future on providing safe bicycle and pedestrian access. The MacArthur BART Station provides a good illustration of this problem, and is discussed below.

We need your support for:

- 1. Including pedestrian and bicycle safety in the draft CEQA Guideline revisions that are ongoing as part of Governor Schwarzenegger's greenhouse gas reduction initiative;**
- 2. Amending the Alameda County Congestion Management Program to include bicycle and pedestrian safety and access;**
- 3. CMA staff support to work with local agencies in developing traffic studies in TOD areas that are related to pedestrian and bicycle improvements;**
- 4. Updating the Alameda Countywide Bicycle Plan to make it consistent with the Countywide Transportation Plan with respect to TOD's.**

We have met with CMA staff to introduce the problems we have with implementing the Bicycle Plan and we specifically request the CMA Board to provide staff with the necessary authority and direction to help us make Alameda County a more pedestrian- and bicycle-friendly county.

The Problem: Case Study: MacArthur BART Station

Attachment A is a presentation made by Jason Patton of the Community & Economic Development Agency of the City of Oakland on December 19, 2008. The presentation describes the challenges of striping bike lanes on West MacArthur Blvd, due to level of service limitations that are part of CEQA review. As Patton's presentation details, reducing W. MacArthur Blvd to 4 lanes (from 6 lanes) would have no impact on LOS immediately and in fact would only have an impact in the "design" year 2035, when it is estimated that 6 lanes will be necessary to accommodate traffic from in-fill development. And fostering the in-fill development is a high priority of the CMA Board. However, the Alameda Countywide Bicycle Plan also has as a high priority "Transit-Priority Zones" and MacArthur BART is one of the listed high priority transit stations. In fact, MacArthur BART has the 4th highest bike parking usage in the BART system. Attachment B are relevant pages from the countywide bike plan.

Potential Solutions:

1. Draft CEQA Guidelines:

As currently drafted, the CEQA Guideline amendments (Attachment C) focus on "capacity" and "levels of service." Pedestrian and bicycle safety and access are not capacity or level of service (LOS) issues. Based on the input of experts, the Governor's Office originally proposed (in January 2009) changing the CEQA Transportation Guidelines to eliminate level of service and replace it with "VMT" increases. While this makes eminent sense if concerned about reducing greenhouse gas omissions, we understand that there are concerns about eliminating LOS. We want to sit down with CMA staff to discuss appropriate language to include in the CEQA amendments that facilitate implementation of all Plans.

2. Congestion Management Program:

We further urge the Alameda County Congestion Management Program address this issue. Currently, a draft revision to the CMP is out for review. The CMP should include policies and regulations that allow for ped/bike improvements in TOD's that may otherwise be precluded by LOS requirements. Once incorporated in the CMP, ped/bike improvements can more easily comply with CEQA requirements under the amended guidelines.

3. CMA staff support for local traffic studies near TOD:

Finally, sometimes the problem lies in the details of the traffic models used to estimate future demand, and in the assumptions that go into such analysis. The CMA staff can provide assistance as needed, on a project-by-project basis, to help simplify the analysis and ensure compliance with local, county and state regulations.

4. Update the Alameda Countywide Bicycle Plan

The Alameda Countywide Bicycle Plan includes bicycle improvements in "Transit-Priority Zones" and dedicates a portion of the High Priority projects to these transit stations. Bikeway projects for transit-priority zones include safe and convenient routes to the transit station, and the highest priority is for connections from countywide corridors, such as Telegraph Avenue in the W. MacArthur Blvd example.

Summary:

The East Bay Bicycle Coalition has as a high priority the goal of improving safe access to transit stations and we certainly share the Board's vision of transit-oriented development. Harmonizing these two goals is necessary. In 2004, the Bay Area's Safe Routes to Transit program was launched, and it is currently being expanded in the update to the Regional Transportation Plan. There are also discussions to include Safe Routes to Transit as part of the new Federal transportation bill. In addition, bicycle usage is growing exponentially in the East Bay. This past Bike to Work Day, bike counts at morning energizer stations increased 45%, after having increased 25% in 2008. BART is also greatly increasing its supply of secure bike parking at its East Bay stations. There is a real need to ensure safe routes to BART stations and to and within infill development that is a part of our Countywide Transportation Plan.

Thank you for your consideration and support.

Sincerely,



Dave Campbell, Chair
East Bay Bicycle Coalition
www.ebbc.org

enclosures

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Attachment C

Draft CEQA Guideline Amendments

XVI. TRANSPORTATION/TRAFFIC -- Would the project:

- a) ~~Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?~~ **Exceed the capacity of the existing circulation system, based on an applicable measure of effectiveness (as designated in a general plan policy, ordinance, etc.), taking into account all relevant components of the circulation system, including but limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?**

- b) ~~Exceed, either individually or cumulatively, a~~ **Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?**

- c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

- d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous

intersections) or incompatible uses (e.g., farm equipment)?

e) Result in inadequate emergency access?

~~f) Result in inadequate parking capacity?~~

gf) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, **bicycle racks**)?

The Level of Service Barrier to Multimodal Transportation



**Jason Patton, PhD
Bicycle & Pedestrian Program Manager
Transportation Services Division**

Forum to Discuss Level of Service Policies
State of California Governor's Office of Planning and Research
December 19, 2008

Oakland General Plan Policies

The City's General Plan policies promote multimodal transportation:

- *Objective T4 – Alternative Modes of Transportation:* Increase use of alternative modes of transportation (LUTE, p. 58).
- *Action 1C.1 – Bikeways to Transit Stations:* Prioritize bicycle access to major transit facilities from four directions, integrating bicycle access into the station design and connecting the station to the surrounding neighborhoods (BMP, p. 56).

Oakland Thresholds of Significance

...and established practice measures transportation impacts primarily in terms of automobile congestion:

- Cause the baseline level of service (LOS) to degrade to worse than LOS D (i.e., LOS E or F) at a signalized intersection that is located *outside* of the Downtown area;
- Cause the baseline LOS to degrade to worse than LOS E (i.e., LOS F) at a signalized intersection that is located *within* the Downtown area (BMP DEIR, p. 4.A-3).

Developing Multimodal Roadways

Implementing multimodal policies while maintaining automobile LOS thus leads to two common scenarios:

- *Existing Roadways and Land Uses*: Reallocate roadway width to include facilities for all modes...
... but create significant impacts on automobile congestion.
- *New Roadways and Land Uses*: Build roadways wide enough to include facilities for all modes...
... but create streetscapes that may not support walking, cycling, and transit.

DNJIM HARRIS
AECOM

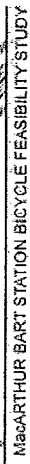
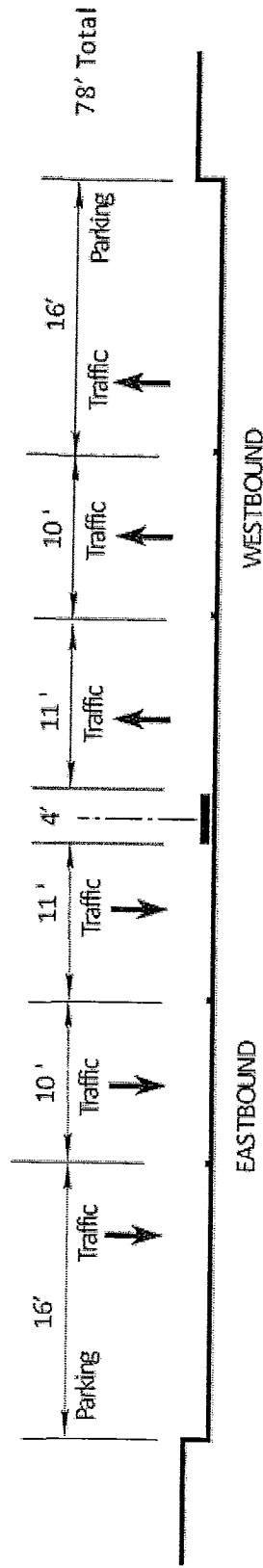


Figure 13 POTENTIAL BICYCLE FACILITIES

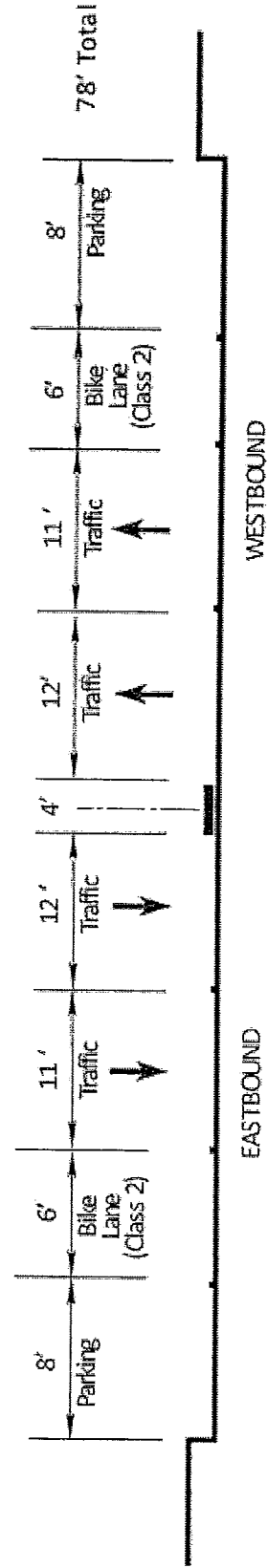
W MacArthur Blvd Cross-sections

...would reconfigure a six-lane street to improve bicycle access to a major transit station:

Existing



Proposed



Roadway Segment Volumes

But traffic is projected to double and triple by 2030...

Street	Endpoint	Endpoint	Direction	2007 Volume	2030 Volume	Increase
W MacArthur Blvd	Market St	West St	WB	546	1652	203%
			EB	593	930	57%
W MacArthur Blvd	West St	MLK Jr Wy	WB	522	1584	203%
			EB	447	1016	127%
W MacArthur Blvd	MLK Jr Wy	Telegraph Ave	WB	671	1723	157%
			EB	435	1195	175%
W MacArthur Blvd	Telegraph Ave	Webster St	WB	575	1751	205%
			EB	755	1011	34%
W MacArthur Blvd	Webster St	Broadway	WB	531	1757	231%
			EB	837	1136	36%
Average (over WB and EB for all segments)				5912	13755	133%

Level of Service (LOS) Analysis

...creating significant and unavoidable impacts at five of the six study intersections.

Intersection	Time	2007		2030		Significant Impact
		Existing	Project	Existing	Project	
W MacArthur Blvd / Market St	AM	B	B	F	F	X
	PM	B	C	E	F	
W MacArthur Blvd / West St	AM	B	B	E	D	X
	PM	B	B	C	E	
W MacArthur Blvd / MLK Jr Wy	AM	B	B	C	C	X
	PM	B	B	D	E	
W MacArthur Blvd / Telegraph Ave	AM	B	B	F	F	X
	PM	C	C	F	F	
W MacArthur Blvd / Webster St	AM	A	A	B	B	
	PM	B	B	B	D	
W MacArthur Blvd / Broadway	AM	E	C	F	F	X
	PM	D	D	F	F	

Key Factors

How does this happen?

1. Land use assumptions
(Association of Bay Area Governments)
2. Trip generation and distribution
(Alameda County Congestion Management Agency)
3. CEQA thresholds of significance
(City of Oakland)

Possible Approaches

How can such projects be implemented?

1. Redesign project to avoid significant impacts.
 - Limits connectivity and quality of bikeways.
2. Complete statement of overriding considerations.
 - Requires City Council to sanction congestion in an EIR.
3. Change the thresholds of significance.
 - Creates legal liability if applied inconsistently.
4. Eliminate study of the future year scenario.
 - Creates legal liability if applied inconsistently.
5. Modify the trip generation rates/distribution.
 - Involves regional agencies and state law.
6. Create statutory exemption (e.g. PRC 21080.19).
 - Requires modification to state law.

2006 COUNTYWIDE BICYCLE PLAN

Alameda County Congestion Management Agency

Adopted October 26, 2006

- Fruitvale Avenue/MacArthur Boulevard
- 73rd Avenue/MacArthur Boulevard
- 73rd Avenue/International Boulevard
- Chabot College
- Union Landing Transit Center
- Ardenwood Park and Ride
- Lido Faire Shopping Center
- Ohlone College

UC Transit

- BART stations
- Union Landing Transit Center
- Alvarado Boulevard/Dyer Street

LAVTA

- BART station
- Livermore Transit Center
- Valley Care Medical Center
- Lawrence Livermore National Laboratory
- Las Positas College
- Valley Care Hospital
- Stoneridge Mall
- First and Neal Streets

Ideally, the bicycle connection would provide direct access from all four quadrants to the periphery of the transit hub, station, or terminal. Implementation of improvements on transit district property would be the responsibility of the transit district and improvements on jurisdictional roadways would be the responsibility of the jurisdictions. Transit-priority Zone projects improve access to transit. Types of projects that would be considered for promoting bicycle access to transit hubs, stations, and terminals and intermodal connections between bikes and other transit connections are:

- On-street bikeways to provide continuous entry to the transit hub, station or terminal.
- Multi-use bikeway facilities to provide continuous entry to the transit hub, station or terminal.

Infrastructure Projects

- Project serves a transit station/hub with the highest existing or potential demand for bicyclists or, if a BART station, is identified as a priority station in the most recent BART Bicycle Access and Parking Plan Table A-11—Bicycle Access Growth Potential.

Bicycle Parking/Storage Projects

- Project provides adequate facilities (e.g., parking, storage, racks) to meet demand plus 10 percent.
- Project serves a transit station/hub with the highest existing or potential demand for bicyclists or, if a BART station, is identified as a priority station in the most recent BART Bicycle Access and Parking Plan Table A-11: Bicycle Access Growth Potential.

Station Access Design Recommendations

Implementing Transit-priority Zone projects should help ensure that transit stations and their immediate vicinity are designed to encourage bicycling. This includes creating bike lanes on approaching roads, designing bicycle entrances to reduce potential conflicts with automobiles and pedestrians, and providing signage to assist bicyclists in getting from the station to nearby bikeways. The emphasis of Transit-priority Zone projects may differ for existing vs. future stations.

Existing Stations

Specific design recommendations for existing stations include:

- Creating at least one designated bicycle entrance, with signage and separation from auto traffic;
- Installing mid-block crossings where station entrances do not coincide with intersections along with appropriate traffic control devices. It is recommended that the visibility of these crossings to approaching motorists be enhanced with signs, pavement flashers and other methods per the judgment of the local traffic engineer;
- Locating bicycle ramps adjacent to stairways; and
- Placing bike storage facilities in covered areas near station entrances.

Future Stations

Specific design recommendations for future stations include:

- Creating station entrances directly on the street, so that stations are not surrounded entirely by parking (Castro Valley BART station is a good example of this);
- Incorporating bikestations or other bike storage facilities in convenient locations;
- Installing bicycle-friendly fare gates and ramps;
- Bicycle ramps adjacent to stairways; and

DEVELOPMENT REVIEW PROCESS

The tiered land use analysis process described below applies to projects requiring GPAs (Tier I[a]) and NOPs for EIRs for projects consistent with an adopted general plan (Tier I[b]). A summary of the Tier 1 requirements is presented in Table 12 and the development review process for Tier 1 is shown in Figure 11. The method of analysis is further detailed in the Land Use Analysis CMP Technical and Policy Guidelines (see Appendix G). For analysis of transportation impacts on the MTS roadways, 2000 Highway Capacity Manual will be used.

The CMA will be responsible for determining whether a project meets the 100 p.m. peak-hour trip-generation threshold criteria. The p.m. peak hour was chosen because in most Alameda County cities, traffic is worse in the p.m. peak hour than in the morning or weekend peak periods. The 100-trip threshold was chosen because it is the level at which most cities ordinarily require a traffic impact study to be prepared. Examples of projects that can generate 100 or more p.m. peak hour trips are: 100 or more single-family homes, 165 apartment units or 135 hotel rooms or more than 45,000 gross square feet of office space. It must be noted that such projects, when part of a proposed GPA, would only qualify for review if they generated 100 *more* p.m. peak-hour trips than the existing land use designation.

Tier I (a)—General Plan Amendments

The CMA reviews GPAs, concurrent with the city's or county's approval process. The CMA will review impacts of the proposed GPAs on the MTS through existing environmental review processes conducted by the local agencies. Upon receiving the initial GPA application, the local agency will forward the GPA proposal to the CMA consistent with the Technical and Policy Guidelines (see Appendix G). The local agency will analyze the data and identify any necessary mitigations as part of the environmental process.

Analysis at the GPA stage—rather than at the project stage—allows cities to proactively plan development, taking into account regional transportation impacts and providing ways to finance transportation costs in advance of development proposals at the tentative map stage or later.

Local jurisdictions are responsible for modeling the proposed general plan amendment using the most recent CMA-certified travel-demand model. The local agency will then send the environmental document to the CMA for a 30- to 45-day review and comment period. The local agency will send a copy of both the draft and final decision/notice of determination to the CMA so that the data may be incorporated into the countywide travel model's land use database, thus keeping it current.

Table 12—Tier I Requirements

ACTION	GENERAL PLAN AMENDMENTS	NOTICES OF PREPARATION
Submit to CMA	Mandatory	Mandatory
Timeframe for submittals	Ongoing	Ongoing
CMA comments	Yes, if project generates at least 100 p.m. peak period trips more than the adopted general plan land use designation	Yes, if project generates 100 p.m. peak period trips (or more) above and beyond expected trips based on existing land use designation

General plan categories can encompass a fairly wide range of trip generators. For example, a parcel may be zoned for “Medium-High Density Residential, 16-30 units per acre.” There is a variation of almost 100 percent between the low and high ends of the allowable density. A variety of land uses with a wide range of trip generation may be allowed within a single zoning designation. In both cases, market conditions at the time of construction will dictate the actual uses. Until then, reasonable assumptions will have to be made regarding the specific trip generation characteristics input to the model.

Tier I(b)—Large-Scale Projects Consistent with General Plan: Notices of Preparation

This tier involves a CMA review of NOPs of EIRs, concurrently with the jurisdiction’s approval process. Every NOP and draft and final environmental document will be forwarded to the CMA for review. The CMA will be responsible for determining whether an application meets the threshold criteria for CMA review and comment. The same review and modeling process described under Tier I(a) applies to Tier I(b).

Tier II

CMA staff will evaluate Tier II projects based on ABAG’s latest land use projections (typically published in even-numbered years). This evaluation will include local input on the distribution of ABAG projections within each jurisdiction. Local jurisdictions will have 60 days to provide input on how their respective ABAG projections will be distributed by traffic analysis zones.

ABAG-consistent data (at the countywide level and for each jurisdiction) will always be used for CMP purposes other than the Land Use Analysis Program.

Analysis of Impacts:

Once the CMA determines that a project meets the 100 p.m. peak hour trip generation threshold criteria, the request for analysis of impacts is done through the environmental review process. The CMA's response to a GPA or a Notice of Preparation for an environmental document requests that a traffic impact study be done and that mitigations be identified. The traffic study components to be addressed in the environmental document by the jurisdiction under the CMP Land Use Analysis Program requirements are summarized below and a sample letter is found in Appendix H.

- *Modeling requirements*

Local jurisdictions are responsible for conducting the model runs using the Countywide Travel Demand Model. Modeling requirements are described under "Responsibility for Modeling" and "Local Government Responsibilities" sections of this chapter. More information on the Countywide Travel Demand Model can be found in Chapter 9- Database and Travel Model.

- *Impacts on the Metropolitan Transportation System (MTS)*

Potential impacts of the project on the roadway and transit MTS need to be addressed. Details on the MTS can be found in Chapter 2- Designated Roadway System. Specific MTS routes in various parts of the county are shown in Figures 2 through 7 of Chapter 2.

- *Adequacy of Mitigation Measures*

Mitigation measures must be adequate to sustain CMP service standards for roadways and transit and must be fully funded. The section on Relationship to California Environmental Quality Act (CEQA) of this chapter describes the background and the requirements of project impact mitigation measures.

- *Impacts on Transit*

Impacts of the project on CMP transit levels of service must be analyzed. Details on how to address the potential impacts on transit levels of service can be found under the section entitled "Relationship to Transit" in this chapter. Additional information related to transit performance measures can be found in Chapter 4- Performance Element.

- *Travel Demand Management (TDM) Strategies*

The CMA encourages using various TDM strategies to reduce auto trips and congestion thereby reducing the need for new roadway facilities and making the most efficient use of existing facilities. More details on the TDM strategies can be found in Chapter 5- Travel Demand Management Element.

- *Bicycle and Pedestrian improvements*
Opportunities to promote bicycle and pedestrian improvements identified in the Alameda Countywide Bicycle Plan and Alameda Countywide Pedestrian Plan adopted by the CMA should be considered.
- *Noise Impacts*
For projects adjacent to state roadway facilities, noise impacts of the projects should be analyzed.
- In addition to the above, a new item will be added to the request for analysis of impacts in 2009. As part of the environmental documentation for a Transit Oriented Development (TOD), jurisdictions are encouraged to analyze a comprehensive TOD Program, which includes environmentally clearing all access improvements necessary to support TOD development. More details on this can be found under Transit Oriented Development section of this chapter.

RESPONSIBILITY FOR MODELING

The current countywide model is updated to reflect ABAG's forecasts in *Projections 2007* for horizon years 2000, 2005, 2015 and 2035. The recently updated countywide model is based on MTC's regional model. The CMA Board amended the CMP requirements on March 26, 1998 so that local jurisdictions are responsible for travel-demand modeling. A countywide model agreement between the jurisdiction/agency and the CMA is required before the model information can be released to the jurisdiction/agency or its consultant.

TRANSIT-ORIENTED DEVELOPMENT

TOD provides high-density and pedestrian-oriented development accessible to transit and other non-motorized forms of transportation. It focuses on establishing a mix of uses, such as employment, residential and retail town centers near transit hubs to provide intermodal opportunities (e.g., BART, bus, autos, bicycling, walking) to reduce reliance on single-occupant vehicles.

BART, the local jurisdictions and community groups in Alameda County support opportunities for Transit-Oriented Development (TOD). Examples of completed TOD projects are the Fruitvale BART Transit Village in Oakland and the downtown Redevelopment Program and the Cannery Area in Hayward. Projects either underway or included in the *Countywide Transportation Plan* are transit villages at MacArthur BART, West Oakland, Coliseum, San Leandro, Warm Springs in Fremont, Union City Intermodal, Dublin/Pleasanton BART and Ed/Roberts Campus in Berkeley.

In support of TOD, the CMA and MTC have set aside Transportation for Livable Communities (TLC) funds to be used as an incentive to local agencies that support and expedite the approval of TOD within their jurisdiction. ABAG has established the FOCUS program to encourage partnerships between regional and local agencies to increase housing near transit, encourage compact and walkable development, and preserve open space. FOCUS includes regional TLC funding for TOD and designated priority development and conservation areas (PDAs and PCAs). A list of 27 planned and potential PDAs in Alameda County are shown on Table 13. The CMA has established a Transit Oriented Technical Assistance Program (TOD-TAP) and a TOD Fund Monitoring Program to assist project sponsors in advancing their projects.

Further, local jurisdictions are encouraged to consider a comprehensive TOD Program, including environmentally clearing all access improvements necessary to support TOD development, in their environmental documentation.

REGIONAL AGENCIES' SMART GROWTH STRATEGY

ABAG—in conjunction with BAAQMD, the San Francisco Bay Conservation and Development Commission, MTC, the Regional Water Quality Control Board and the Bay Area Alliance for Sustainable Development completed the Regional Alliances Smart Growth Strategy Bay Area Alliance for Sustainable Development Regional Livability Footprint Project. The overall goal was to achieve support among public officials, civic leaders and stakeholder organizations for a preferred land use pattern that will inform decision-makers on how the Bay Area could grow over the next 20 years. The study resulted in SMART Growth Projections 2003, focusing development in the urban core. Projections 2003 land use was used to update the *Regional Transportation Plan* in 2005. The subsequent Projections series developed by ABAG, Projections 2005 and Projections 2007, continued to be based on the Smart Growth concept. The 2009 update to the *Regional Transportation Plan* used Projections 2007.

APPENDIX H **Sample Response for GPA or NOP**

To

Mr.

City/County of xxxxxxxx

SUBJECT: Comments on the Notice of Preparation of a Draft Environmental Impact Report (DEIR) for the City/County of xxxxxxxx

Dear Mr/Ms:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for a Draft Environmental Impact Report (DEIR) for

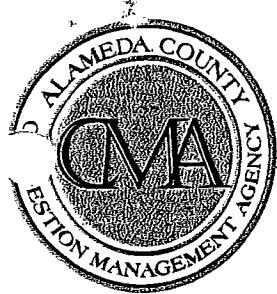
The Alameda County Congestion Management Agency (ACCMA) respectfully submits the following comments:

- The City of xxxxxxxx adopted Resolution No. on establishing guidelines for reviewing the impacts of local land use decisions consistent with the Alameda County Congestion Management Program (CMP). If the proposed project is expected to generate at least 100 p.m. peak hour trips over existing conditions, the CMP Land Use Analysis Program requires the City to conduct a traffic analysis of the project using the Countywide Transportation Demand Model for projection years 2015 and 2035 conditions. Please note the following paragraph as it discusses the responsibility for modeling.
 - The CMA Board amended the CMP on March 26th, 1998 so that local jurisdictions are responsible for conducting the model runs themselves or through a consultant. The ACCMA has a Countywide model that is available for this purpose. The City/County of xxxxxxxx and the ACCMA signed a Countywide Model Agreement on Before the model can be used for this project, a letter must be submitted to the ACCMA requesting use of the model and describing the project. A copy of a sample letter agreement is available upon request.
- Potential impacts of the project on the Metropolitan Transportation System (MTS) need to be addressed. (See 2009 CMP Figures E-2 and E-3 and Figure 2). The DEIR should address all potential impacts of the project on the MTS roadway and transit systems. These include MTS roadways as shown in the attached map as well as BART and AC Transit. Potential impacts of the project must be addressed for 2015 and 2035 conditions.
 - Please note that the ACCMA does *not* have a policy for determining a threshold of significance for Level of Service for the Land Use Analysis Program of the CMP. Professional judgment should be applied to determine the significance of project impacts (Please see chapter 6 of 2009 CMP for more information).
 - For the purposes of CMP Land Use Analysis, 2000 Highway Capacity Manual is used.

ANALYSIS OF IMPACTS:

Once the CMA determines that a project meets the 100 p.m. peak hour trip generation threshold criteria, the request for analysis of impacts is done through the environmental review process. The CMA's response to a GPA or a Notice of Preparation for an environmental document requests that a traffic impact study be done and that mitigations be identified. The traffic study components to be addressed in the environmental document by the jurisdiction under the CMP Land Use Analysis Program requirements are summarized below and a sample letter is found in Appendix H.

- *Modeling requirements*
Local jurisdictions are responsible for conducting the model runs using the Countywide Travel Demand Model. Modeling requirements are described under "Responsibility for Modeling" and "Local Government Responsibilities" sections of this chapter. More information on the Countywide Travel Demand Model can be found in Chapter 9- Database and Travel Model.
- *Impacts on the Metropolitan Transportation System (MTS)*
Potential impacts of the project on the roadway and transit MTS need to be addressed. Details on the MTS can be found in Chapter 2- Designated Roadway System. Specific MTS routes in various parts of the county are shown in Figures 2 through 7 of Chapter 2.
- *Adequacy of Mitigation Measures*
Mitigation measures must be adequate to sustain CMP service standards for roadways and transit and must be fully funded. The section on Relationship to California Environmental Quality Act (CEQA) of this chapter describes the background and the requirements of project impact mitigation measures.
- *Impacts on Transit*
Impacts of the project on CMP transit levels of service must be analyzed. Details on how to address the potential impacts on transit levels of service can be found under the section entitled "Relationship to Transit" in this chapter. Additional information related to transit performance measures can be found in Chapter 4- Performance Element.
- *Travel Demand Management (TDM) Strategies*
The CMA encourages using various TDM strategies to reduce auto trips and congestion thereby reducing the need for new roadway facilities and making the most efficient use of existing facilities. More details on the TDM strategies can be found in Chapter 5- Travel Demand Management Element.



ALAMEDA COUNTY
CONGESTION MANAGEMENT AGENCY

ATTACHMENT 3

1333 BROADWAY, SUITE 220 • OAKLAND, CA 94612 • PHONE: (510) 836-2560 • FAX: (510) 836-2185
E-MAIL: mail@accma.ca.gov • WEB SITE: accma.ca.gov

August 26, 2009

AC Transit
Director
Greg Harper

Alameda County
Supervisors
Nate Milley
Scott Haggerty

City of Alameda
Mayor
Beverly Johnson
Vice Chair

City of Albany
Councilmember
Farid Javandel

BART
Director
Thomas Blalock

City of Berkeley
Councilmember
Kris Worthington

City of Dublin
Mayor
Tim Sbranti

City of Emeryville
Vice-Mayor
Ruth Atkin

City of Fremont
Councilmember
Robert Wiecekowski

City of Hayward
Councilmember
Olden Hanson

City of Livermore
Mayor
Marshall Kamena

City of Newark
Councilmember
Luis Freitas

City of Oakland
Councilmember
Larry Reid

City of Piedmont
Councilmember
John Chiang

City of Pleasanton
Mayor
Jennifer Hosterman

City of San Leandro
Councilmember
Joyce R. Starosciak

City of Union City
Mayor
Mark Green
Chair

Executive Director
Dennis R. Fay

Christopher Calfee, Special Counsel
ATTN: CEQA Guidelines
California Resources Agency
1017 L Street, #2223
Sacramento, CA 95814

SUBJECT: Comments on Proposed Regulatory Action Related to the CEQA Guidelines

Dear Mr. Calfee:

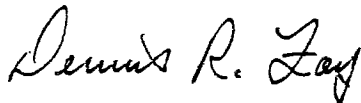
Thank you for the opportunity to comment on the Draft CEQA Guideline Amendments. The Alameda County Congestion Management Agency (ACCMA) has recommended changes to several sections of transportation checklist to include consideration of impacts to mass transit, bicycling, walking and goods movement. We recommend the following changes and additions to Appendix G – Environmental Checklist Form – Section XVI (Transportation/Traffic):

- a) ~~Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?~~ Exceed the capacity of the existing circulation system, based on an applicable measure of effectiveness (as designated in a general plan policy, ordinance, etc.), taking into account all **modes of transportation including mass transit (e.g., buses, light or heavy rail for people) and nonmotorized travel (e.g., bikeways and pedestrian facilities) and** all relevant components of the circulation system, including but **not** limited to intersections, streets, highways and freeways, pedestrian facilities, bikeways, bicycle paths, and mass transit?
- d) ~~Substantially increase hazards due to a design feature (e.g., sharp curves additional and/or inadequate dangerous intersections) or incompatible uses (e.g., farm equipment)?~~ **Substantially decrease traffic safety (e.g. due to adversely affecting sight distance, facilitating high speeds or by mixing incompatible uses, such as farm equipment)?**

- f) Conflict with adopted policies, plans, or programs **regarding** ~~supporting or expanding~~ **mass transit, carpooling, vanpooling,** or non-motorized transportation ~~alternative transportation (e.g., bus turnouts, bicycle racks)?~~
- g) **Cause an impact to mass transit or non-motorized transportation facilities, including an impact to safety, based on an applicable measure of effectiveness (as designated in a General Plan policy, ordinance, etc)?**
- h) **Reduce, sever, or eliminate pedestrian or bicycle circulation or access, or preclude future planned and approved bicycle or pedestrian circulation?**
- i) **Cause a degradation of the performance or availability of the movement of goods and services?**

Thank you again for the opportunity to comment on these important guidelines. Please feel free to contact me or Beth Walukas (510/350-2326) of my staff if you have any questions.

Sincerely,



Dennis Fay
Executive Director

Cc: ACTAC
Beth Walukas, Planning Manager

File: CMP – Environmental Review Opinions – Responses – 2009